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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE BARRY TED MOSKOWITZ)

UNITED STATES OF AMERICA, Plaintiff, v. OMAR JINESTA (1), Defendant.	Case No. 08CR0286-BTM **NOTICE OF MOTIONS AND MOTIONS TO:** **1) Compel discovery and preserve evidence; and** **2) Grant leave to file further motions.** Date: March 7, 2008 Time: 1:30 p.m.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND RANDY K. JONES, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 7, 2008 at 1:30 p.m. or as soon thereafter as counsel may be heard, defendant, Omar Jinesta, by and through his attorney, Lewis C. Muller, will ask this Court to enter an order granting the motions listed below.

/ / / /

MOTIONS

Defendant Omar Jinesta, the accused in this case, by and through his attorney, Lewis C. Muller, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

1) To compel discovery and preserve evidence; and

2) To grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials which may be brought to this Court's attention prior to or at the time of the hearing on these motions.

Dated: *February 22, 2008* Respectfully submitted,

S/Lewis C. Muller
LEWIS C. MULLER
Attorney for Defendant
Omar Jinesta